

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**MONICA ABBOUD**, individually and  
on behalf of all others similarly situated,

*Plaintiff,*

v.

**AGENTRA, LLC,**

*Defendant.*

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**Case No. 3:19-cv-120**

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND MEDIATION DEADLINE**

Defendant Agentra, LLC’s (“Defendant”) files this Unopposed Motion to Extend the mediation deadlines contained in the Court’s April 12, 2019 Class Certification Scheduling Order [Dkt. 25] and would respectfully show as follows:

The Court’s Class Certification Scheduling Order requires the Parties mediate the case on or before December 2, 2019 and file a Joint Mediation Report within seven (7) days after the mediation occurs. Despite efforts by counsel for Plaintiff and Defendant, the parties have been unable to schedule a mediation on or before the December 2, 2019 deadline due to the availability of all parties involved.

Defendant requests a 53-day extension to complete mediation and file the subsequent joint mediation report, making the deadline to complete mediation January 24, 2020. The Parties have agreed to conduct a half-day mediation with Mr. Bruce Freidman on Friday, January 24, 2020. Plaintiff does not oppose this motion.

This request is not sought for delay but so that justice may be done.

**PRAYER FOR RELIEF**

For the reasons set forth above, Defendant requests that this Court grant this Unopposed Motion to Extend Scheduling Order Deadlines and extend the deadline to complete mediation to January 24, 2020.

Dated: December 2, 2019

Respectfully submitted,

/s/ William S. Richmond  
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**COUNSEL FOR DEFENDANT**  
**AGENTRA, LLC**

**CERTIFICATE OF SERVICE**

The undersigned counsel for Defendant Agentra, LLC does hereby certify that this pleading was served on counsel of record on December 2, 2019 by electronic filing.

/s/ William S. Richmond  
WILLIAM S. RICHMOND